

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF TENNESSEE

RALPH WARD, )  
Plaintiff, )  
v. ) Civil Action No: 3:20-cv-981  
KEVIN REYNOLDS, )  
Et al., )  
Defendants. )  
Judge Richardson  
Magistrate Holmes  
JURY DEMAND

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**NOTICE OF FILING – AMENDED 30b6 NOTICE**

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Comes now Plaintiff, by and through Counsel, and submits this Notice of Filing in connection with the parties' Joint Request for a Discovery Conference (ECF 57) to provide the Court with Plaintiff's **First Amended Deposition Notice: Metro 30(b)(6) Witness**, which Plaintiff served on Defendants on October 6, 2022. Plaintiff believes that the amended notice resolves at least some of Metro's objections, particularly the objections to Topics 3, 4, and 6 (e.g., the former topic No. 6 has been deleted in this amended notice).

Respectfully submitted,

*s/ Kyle Mothershead*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on **October 7, 2022**, Plaintiff's **Notice of Filing** was filed electronically with the Court's electronic filing system. Notice of this filing will be electronically served by operation of the Court's electronic filing system on **Mallory Ricci, and Melissa Roberge, Counsel for Defendants**, at [Mallory.Ricci@nashville.gov](mailto:Mallory.Ricci@nashville.gov), and [Melissa.Roberge@nashville.gov](mailto:Melissa.Roberge@nashville.gov), and **Jay Clifton**, co-counsel for Plaintiff, at [jaycliftonesq@gmail.com](mailto:jaycliftonesq@gmail.com).

*s/ Kyle Mothershead*  
Kyle Mothershead, BPR 22953